

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ANDREW DOE

PLAINTIFF

V.

CIVIL ACTION NO. 3:18-cv-138-DPJ-ASH

**STATE OF MISSISSIPPI; THE UNIVERSITY OF
MISSISSIPPI; STATE INSTITUTIONS OF HIGHER
LEARNING (“IHL”), ET AL.**

DEFENDANTS

**DEFENDANTS’ MOTION TO PRECLUDE
PLAINTIFF’S USE OF PSEUDONYM AT TRIAL**

Defendants respectfully move the Court for an order precluding Plaintiff’s use of a pseudonym at trial. In support of this motion, Defendants state as follows:

1. Doe has not shown any potential harm of proceeding without pseudonymity.
2. Allowing Doe to proceed to trial under pseudonym would be prejudicial to Defendants.
3. In support of their Motion, Defendants rely on the pleadings and other papers filed of record in this matter, as well as the following exhibits:

Exhibit 1: November 22, 2023 Report of Holly Sharp; and

Exhibit 2: January 27, 2024 Deposition of Andrew Doe (Confidential).

Defendants are filing separately their Memorandum in Support of their Motion to Preclude Plaintiff’s Use of Pseudonym at Trial and adopt herein all arguments set forth in the Memorandum.

FOR THESE REASONS, Defendants respectfully seek an order precluding Plaintiff’s use of a pseudonym at trial. Defendants request such other relief as the Court deems appropriate under the circumstances.

Dated: March 8, 2024

Respectfully submitted,

**STATE OF MISSISSIPPI; THE UNIVERSITY OF
MISSISSIPPI; STATE INSTITUTIONS OF HIGHER
LEARNING (“IHL”); THE BOARD OF TRUSTEES
OF STATE INSTITUTIONS OF HIGHER LEARNING;
C.D. SMITH, JR.; SHANE HOOPER; TOM DUFF; DR.
FORD DYE; ANN H. LAMAR; DR. ALFRED E.
MCNAIR, JR.; CHIP MORGAN; HAL PARKER;
ALAN W. PERRY; CHRISTY PICKERING; DR. DOUG
ROUSE; DR. J. WALT STARR; GLENN F. BOYCE;
JEFFREY S. VITTER**

/s/ J. Andrew Mauldin

J. CAL MAYO, JR. (MB NO. 8492)
PAUL B. WATKINS, JR. (MB NO. 102348)
J. ANDREW MAULDIN (MB NO. 104227)
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